



COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Cable
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D.T.C. 23-1

March 23, 2023

DISH Wireless L.L.C. d/b/a Gen Mobile Petition for Designation as an Eligible
Telecommunications Carrier

**FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO DISH WIRELESS L.L.C. d/b/a GEN MOBILE**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to DISH Wireless L.L.C. d/b/a Gen Mobile the following information requests:

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. All answers should be filed with the Department by the close of business on **April 13, 2023**.
2. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
3. The term “DISH” means DISH Wireless, L.L.C. d/b/a Gen Mobile and its corporate predecessors, agents, officers, employees, and assigns.
4. The term “Petition” means DISH’s petition for Limited Designation as an Eligible Telecommunications Carrier filed that the Department received on January 31, 2023.
5. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data,

estimates or assumptions were drawn and support for the data or assumptions DISH used in developing the projections or estimates.

6. The term “ETC” means eligible telecommunications carrier.
7. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. Requests shall be deemed continuing so as to require further supplemental responses if DISH and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
9. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

Requests

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| D.T.C. 1-1 | State whether DISH presently has physical facilities in Massachusetts. If yes, please elaborate on the extent of the facilities in Massachusetts. |
| D.T.C 1-2 | Refer to exhibit 3. Are all zip codes listed currently covered using DISH’s own active facilities? If not, identify all Massachusetts zip codes where DISH offers mobile voice or mobile broadband service using its own 5G facilities. |
| D.T.C. 1-3 | Identify any state in which DISH currently offers Lifeline service and the number of Lifeline subscribers nationwide. |
| D.T.C. 1-4 | Identify any state in the past that DISH offered Lifeline service, but does not currently. |
| D.T.C. 1-5 | Provide the number of current DISH non-Lifeline mobile voice and broadband subscribers nationwide and in Massachusetts. |